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10 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA  
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14 UNITED STATES OF AMERICA,  
15 Plaintiff,  
16 v.  
17 PETER G. MORRIS, *et al.*  
18 Defendants.  
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No. CV10-4436 GHK (RC)

JOINT STIPULATION RE: ENTRY OF  
TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION  
AGAINST PETER G. MORRIS, PETER  
MORRIS d/b/a THE TEAM REALTY  
GROUP AND PETER MORRIS d/b/a  
NATIONS WEST INVESTMENT

[Concurrently Filed with Proposed  
Order]

1 Plaintiff United States of America (“United States”), and defendants Peter G.  
2 Morris, Peter G. Morris dba The Team Realty Group and Peter G. Morris dba  
3 Nations West Investments (collectively, “Defendants”), by and through their  
4 undersigned counsel, hereby agree and stipulate to the entry of a Temporary  
5 Restraining Order and Preliminary Injunction as follows:

6 1. Defendants are enjoined and restrained from engaging in the  
7 following acts during the pendency of the above-entitled action:

8 (a) acting in any capacity, including, but not limited to, as a real  
9 estate agent, salesperson or broker, including but not limited to an agent for buyers  
10 (“buyers agent”) or sellers (“sellers agent” or “listing agent”), real estate agent, real  
11 estate broker, mortgage broker, loan officer, or loan processor, as allowed and  
12 defined by California law, including, but not limited to, applicable California  
13 licensing authorities and the California Business and Professions Code.

14 (b) selling, offering to sell, buying, offering to buy, soliciting offers  
15 to buy, soliciting prospective sellers or purchasers of, soliciting or obtaining  
16 listings of, negotiating the purchase, sale, or exchange of real property or any  
17 interest or title thereof;

18 (c) selling or offering to sell, buying or offering to buy, or  
19 exchanging or offering to exchange, a real property sales contract, or a promissory  
20 note secured directly or collaterally by a lien on real property or on a business  
21 opportunity, or performing services for the holders thereof;

22 (d) soliciting borrowers or lenders for, or negotiating loans or  
23 collecting payments or performing services for borrowers or lenders or note  
24 owners in connection with loans secured directly or collaterally by liens on real  
25 property or on a business opportunity;

26 (e) using the mails or wire transmissions or causing use of the mail  
27 or wire transmissions in connection with any attempt or effort by any individual or  
28 entity, including but not limited to any Defendants, obtaining, securing, applying

1 for any type of mortgage loan, including but not limited to conventional mortgages  
2 or any mortgage insured by any federal entity such as the Federal Housing  
3 Administration (“FHA”) or Department of Veterans Affairs (“VA”).

4 (f) soliciting or obtaining clients, consumers, individuals, entities  
5 or prospective borrowers, for originating, processing, preparing, or otherwise  
6 handling any type of mortgage loan, including but not limited to conventional  
7 mortgages or any mortgage loan insured by any federal entity, including FHA or  
8 VA-insured mortgage loans;

9 (g) originating, processing or preparing, or causing or participating  
10 in the origination, processing or preparation of, any type of mortgage loan,  
11 including but not limited to conventional mortgages or any insured by any federal  
12 entity, including FHA or VA-insured mortgage loans;

13 (h) submitting, or causing to be submitted, any claims for FHA or  
14 VA insurance coverage on loans in default;

15 (i) submitting, or causing to be submitted, or participating in any  
16 way in any submission for any requests to any type of mortgage loan lender in  
17 connection to any type of mortgage loan obligation.

18 (j) engaging in any real estate transactions involving transfers,  
19 sales and/or purchases of any real property currently owned by Defendants, or been  
20 owned within the last ten (10) years, or any real property currently owned by or  
21 that has been owned by within the last ten (10) years by any household family  
22 member of Defendants, without the prior approval of the Court.

23 (k) destroying, moving, altering, disposing of or in any other  
24 fashion failing to maintain business, financial, accounting, real estate and legal  
25 records relating to real estate transactions during the past ten (10) years;

26 2. To the extent Defendants are licensed to do so pursuant to the  
27 appropriate state law, excluded from Paragraph 1 are the following acts only:

28 (a) To the extent Defendants are currently serving as a listing agent

1 in connection with any existing listing agreements for real properties that were  
2 entered into before the date of the signing of this Stipulation, Defendants may  
3 continue to serve in such capacity until the listing expires, ends, or is withdrawn  
4 for any reason;

5 (b) To the extent any of the properties under Paragraph 2(a) are  
6 currently in escrow, or will be in escrow, Defendants must send via U.S. mail  
7 addressed to Assistant United States Attorneys Indira J. Cameron-Banks and  
8 Sekret T. Sneed, United States Attorney's Office, Federal Building, Suite 7516,  
9 300 North Los Angeles Street, Los Angeles, California 90012 ("USAO"), any and  
10 all relevant documents relating to the transaction, including, but not limited to, any  
11 mortgage loan application and the California Residential Purchase Agreement and  
12 Joint Escrow Instructions within five (5) business days after the Court enters an  
13 Order regarding this stipulation, or to the extent that a property under Paragraph  
14 2(a) is not currently in escrow, within five (5) business days after a property goes  
15 into escrow.

16 (c) Defendants may conduct the following specific acts in  
17 connection with rentals and/or leases of residential and/or commercial real  
18 properties:

19 (i) solicit, negotiate, prepare, maintain, draft, or process  
20 rental or lease agreements; and,

21 (ii) solicit and conduct management activities in connection  
22 to rental properties, including showing property, conducting maintenance, and  
23 collecting rents.

24 3. Within five (5) days after the date the Court enters an Order regarding  
25 this Stipulation, Defendants must provide the USAO with a list of all real  
26 properties that Defendants currently are involved with in any capacity, including,  
27 but not limited to, as a listing agent, real estate agent and/or real estate broker.

28 4. Starting on October 30th, and on the 30th of each month after the

1 Court enters an Order regarding the Stipulation, Defendants must provide the  
2 USAO with a list of all real properties that Defendants currently are involved with  
3 in any capacity, including, but not limited to, as a listing agent, real estate agent  
4 and/or real estate broker. This reporting requirement shall continue during the  
5 pendency of this action.

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7 Dated: October 8, 2010

Respectfully submitted,

8 ANDRÉ BIROTTE JR.  
9 United States Attorney  
10 LEON W. WEIDMAN  
11 Assistant United States Attorney  
12 Chief, Civil Division

13 /s/  
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15 INDIRA J. CAMERON-BANKS  
16 Assistant United States Attorney  
17 SEKRET T. SNEED  
18 Assistant United States Attorney

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

16 Dated: October 8, 2010

Respectfully submitted,

17 JOZEF G. MAGYAR  
18 LAW OFFICES OF HERMAN THORDSEN

19 /s/  
20 \_\_\_\_\_  
21 JOZEF G. MAGYAR

22 Attorneys for Defendants  
23 PETER G. MORRIS, PETER G. MORRIS dba  
24 THE TEAM REALTY GROUP and PETER G.  
25 MORRIS dba NATIONS WEST INVESTMENTS  
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